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May 15, 2018

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Jason Galanis et al  
16-cr-0371-4 (RA)

Application denied. The Court deems it appropriate for Mr. Cooney to be present at the final pre-trial conference. SO ORDERED.

  
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Ronnie Abrams  
United States District Judge

Dear Judge Abrams:

I represent defendant Bevan Cooney in the above-captioned matter. This Court previously endorsed Mr. Cooney's waiver of appearance at pre-trial conferences (Dkt. 82). As the Court may recall, Mr. Cooney resides out-of-state and is facing significant financial challenges. Waiving Mr. Cooney's appearance at the May 16, 2018 conference, pursuant to the terms of the endorsed waiver, will enable Mr. Cooney to avoid the substantial expenses associated with travel to and from Court. Mr. Cooney is fully aware that the Court will hear argument in connection with the parties' pretrial motions at this week's conference. Undersigned counsel will fully brief Mr. Cooney on the results of the conference and continue to keep him informed of all that transpires in Court.

Based on the foregoing, counsel for Mr. Cooney respectfully requests that the Court confirm that his attendance is excused from the May 16, 2018, hearing in this matter. See Fed. R. Crim. P. 43(b)(3).

Respectfully submitted,

/S/

Paula J. Notari  
Attorney for Bevan Cooney

cc:  
AUSA Brian Blais (via ECF)  
AUSA Rebecca Mermelstein (via ECF)  
AUSA Aimee Hector (via ECF)  
All Defense Counsel (via ECF)  
Bevan Cooney (via email)